IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:) Chapter 11
ION GEOPHYSICAL CORPORATION, et al.,1) Case No. 22-30987
Debtors.) Jointly Administered

NOTICE OF AGENDA FOR FIRST DAY HEARING ON FIRST DAY MOTIONS SCHEDULED FOR APRIL 13, 2022, AT 1:30 P.M. (PREVALING CENTRAL TIME), BEFORE JUDGE ISGUR AT THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS, AT COURTROOM 404, 515 RUSK STREET, HOUSTON, TEXAS 77002

- 1 Evidentiary Support for First Day Pleadings.
 - A. *First Day Declaration*. Declaration of Mike Morrison, Executive Vice President and Chief Financial Officer of ION Geophysical Corporation, in Support of Chapter 11 Petitions and First Day Motions [Docket No. 4].

<u>Status</u>: The Declaration will be relied upon as evidentiary support for the first day matters listed below.

B. **DIP Declaration**. Declaration of Jakub Mleczko in Support of (I) Motion for Entry of Order Authorizing Debtors to Obtain Senior Secured Superpriority Postpetition Financing and Use of Cash Collateral and (II) Motion for Entry of Order Approving Bid Procedures [Docket No. 6].

<u>Status</u>: The Declaration will be relied upon as evidentiary support for the first day matters listed below.

2 Financing Motion.

A. **DIP Motion**. Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to (I) Obtain Postpetition Financing, (II) Use Cash Collateral, (III) Grant Senior Secured Liens and Provide Claims with Superpriority Administrative Expenses Status, and (IV) Grant Adequate Protection to the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: ION Geophysical Corporation (6646); I/O Marine Systems, Inc. (3230); ION Exploration Products (U.S.A.), Inc. (1394); and GX Technology Corporation (0115). The location of the Debtors' service address is 4203 Yoakum Blvd., Suite 100, Houston, Texas 77006.

Prepetition Secured Parties, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 5].

3 First Day Pleadings.

A. *Cash Management Motion*. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Maintain Existing Business Forms, and (C) Perform Intercompany Transactions, and (II) Granting Related Relief [Docket No. 8].

Status: This matter is going forward.

B. **Vendor Motion**. Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing the Payment of Critical Vendor Claims, Foreign Claims, Lien Claims, and 503(B)(9) Claims, (II) Confirming Administrative Expense Priority of Outstanding Purchase Orders, and (III) Granting Related Relief [Docket No. 12].

Status: This matter is going forward.

C. *Wages Motion*. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Docket No. 10].

Status: This matter is going forward.

D. *Insurance Motion*. Debtors' Emergency Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto, (II) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, (III) Honor the Terms of the Premium Financing Agreement and Pay Premiums Thereunder, and (IV) Enter into New Premium Financing Agreements [Docket No. 13].

Status: This matter is going forward.

E. **NOL Motion**. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers and Declarations of Worthlessness with Respect to Common Stock or Preferred Stock and (II) Granting Related Relief [Docket No. 16].

Status: This matter is going forward.

F. *Taxes Motion*. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 14].

Status: This matter is going forward.

G. *Utilities Motion*. Debtors' Emergency Motion for Entry of an Order (A) (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (B) Granting Related Relief [Docket No. 15].

Status: This matter is going forward.

H. *Creditor Matrix / Equity Holders Motion*. Debtors' Emergency Motion for Entry of an Order (I) Waiving the Requirement to File a List of Equity Security Holders, (II) Authorizing the Debtors to Redact Certain Personal Identification Information, (III) Approving the Form and Manner of Notice of the Commencement of these Chapter 11 Cases, and (IV) Granting Related Relief [Docket No. 18].

Status: This matter is going forward.

I. Schedules and SOFAs Extension Motion. Debtors' Emergency Motion for Entry of an Order (I) Extending Time to File (A) Schedules of Assets and Liabilities, (B) Schedules of Current Income and Expenditures, (C) Schedules of Executory Contracts and Unexpired Leases, (D) Statement of Financial Affairs, and (E) Rule 2015.3 Financial Reports and (II) Granting Related Relief [Docket No. 19].

Status: This matter is going forward.

J. *Epiq Retention Application*. Debtors' Emergency Application for Entry of an Order Appointing Epiq Corporate Restructuring, LLC as Claims, Noticing, Solicitation, and Administrative Agent [Docket No. 17].

Status: This matter is going forward.

K. *Motion to Enforce Automatic Stay*. Debtors' Emergency Motion for Entry of an Order (I) Restating and Enforcing the Worldwide Automatic Stay, Anti-Discrimination Provisions, and *Ipso Facto* Protections of the Bankruptcy Code, (II) Approving the Related Form and Manner of Notice, and (III) Granting Related Relief [Docket No. 20].

Status: This matter is going forward.

Dated: April 13, 2022 Houston, Texas

WINSTON & STRAWN LLP

/s/ Katherine A. Preston

Katherine A. Preston (TX Bar No. 24088255)

800 Capitol St., Suite 2400 Houston, Texas 77002 Telephone: (713) 651-2600

Facsimile: (713) 651-2700 Email: kpreston@winston.com

and

Timothy W. Walsh (pro hac vice pending)

200 Park Avenue

New York, New York 10166 Telephone: (212) 294-6700 Facsimile: (212) 294-4700 E-mail: twwalsh@winston.com

and

Daniel J. McGuire (pro hac vice pending)

35 W. Wacker Drive

Chicago, Illinois 60601-9703 Telephone: (312) 558-3733 Facsimile: (312) 558-5700 Email: dmcguire@winston.com

Proposed Counsel to the Debtors and Debtors in Possession